

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

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IN RE:

**JORGE GERARDO QUILES MALDONADO**

DEBTOR(S)

CASE NC 19-03782-ESL

CHAPTER 13

USBC '19 JUL 12 AM 11:07

**CREDITOR DAMARIS SANTIAGO'S URGENT MOTION TO OBJECT THE NEW  
BANKRUPTCY FILLED BY DEBTOR and TO REQUEST AUTHORIZATION TO  
PROCEED WITH CONTEMPT FOR NON-PAYMENT OF CHILD SUPPORT IN  
STATE COURT**

**COMES NOW** the Creditor, Damaris Santiago Méndez (hereinafter referred to as the "Creditor"), in one's own rights, and files this **MOTION TO OBJECT THE NEW BANKRUPTCY FILLED BY DEBTOR**, and in support there of states as follows:

1. The Debtor owes the total amount of **\$26,706.84** of child support.
2. The new bankruptcy filed is to avoid a contempt of the State Court, since the only reason mentioned by Mr. Quiles is to file the bankruptcy is the child support debt.
3. In regards of the last bankruptcy filed (18-01599-ESL) and in which was rejected, I did not receive any child support payment what so ever, likewise, affecting the wellness of the child.
4. Not even during the process of the last bankruptcy filed (18-01599-ESL), Mr. Quiles never paid the current child support on time.
5. Another bankruptcy filed, without doubt, would be dismissed all over again.
6. Parents with child support debts should not be permitted to use the Court of Bankruptcy in order to avoid on paying child support.
7. The State Court has established a hearing for the case to be given on July 31, 2019.
8. The new bankruptcy should not proceed and if it is to be proceeded, then the action taken before by the State Court in reference to the last bankruptcy rejected (18-01599-ESL) should continue as it was.

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9. In addition, in the best welfare of the child in this case, the Creditor wishes to continue the contempt procedure against the Debtor in the State Court for the child support debt incurred after the filing of the bankruptcy.

**WHEREFORE**, the Creditor respectfully requests that this Honorable Court:

- A. Object the Debtor's petition for a new bankruptcy;
- B. Authorize the Creditor to continue the contempt proceedings for the child support debt contracted after the filing of the bankruptcy in the State Court; and
- C. For such other relief as this Court deems necessary and just.

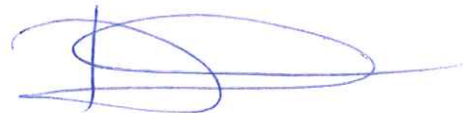
**NOTICE**

Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

**THE SERVICEMEMBERS CIVIL RELIEF ACT (SCRA)**

According to the best information and belief of the Creditor, the debtor is not part of the military service.

**Respectfully submitted on this 10<sup>th</sup> day of July, 2019.**



**DAMARIS SANTIAGO MÉNDEZ**

Creditor

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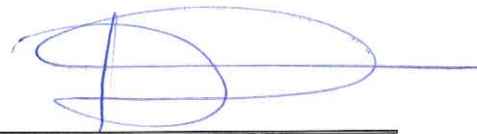
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>nd</sup> day of July, 2019. CREDITOR DAMARIS SANTIAGO'S URGENT MOTION TO OBJECT THE NEW BANCROPTCY FILLED BY DEBTOR and TO REQUEST AUTHORIZATION TO PROCEED WITH CONTEMPT FOR NON-PAYMENT OF CHILD SUPPORT IN STATE COURT, a copy of was mail first class mail to:

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273 Uruguay Street  
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**DAMARIS SANTIAGO MENDEZ**  
Creditor